



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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DALLAS, TEXAS 75270

Office of the Regional Administrator

September 17, 2020

Lisa W. Jordan, Director
Kimberly Terrell, PhD, Staff Scientist
Tulane Environmental Law Clinic
6329 Freret St., Suite 130
New Orleans, LA 70118

Dear Ms. Jordan and Dr. Terrell,

Thank you for your letter expressing your concerns regarding EPA's plans to discontinue the Chloroprene Community Monitoring. We are committed to working with the community in St. John the Baptist Parish to fulfill our mission of protecting human health and the environment.

We have been working with the community on issues related to air contaminants for many years and have specifically been conducting ambient monitoring for chloroprene at six locations in the community of LaPlace, Louisiana since May of 2016. The goal of this monitoring effort was to gather longer term data about the ambient chloroprene levels in the LaPlace community and we have met that goal. As part of this effort, we have collected over 2,500 measurements of the chloroprene concentrations in the community. Since March 2018, when Denka implemented numerous significant chloroprene emission control measures, average concentrations indicate a reduction in the level of chloroprene and a downward trend at all monitoring sites. Our long-term comparison of the EPA and Denka air monitoring data indicate that Denka's air monitoring data results have generally followed a track similar to EPA's monitoring data. Denka has recently committed to continue their air monitoring efforts in the community through 2021.

The Continuous Air Monitoring Program was not designed as a replacement for the Chloroprene Community Monitoring or to measure long term ambient chloroprene levels. Rather, it is designed to help EPA understand the magnitude and frequency of occasional, but recurring, elevated chloroprene measurements or "spikes" that, as demonstrated by the community ambient monitoring data, contribute significantly to the long-term chloroprene averages. Another objective of the Continuous Air Monitoring Program is to help identify unknown or under-characterized emissions sources or activities at the facility. This continuous monitoring approach may help EPA identify possible actions that Denka could take to further reduce chloroprene in the community.

EPA began the Continuous Air Monitoring Program in March 2020. The Continuous Air Monitoring Program utilizes SPods to continuously measure concentrations of Volatile Organic Compounds (VOCs). Chloroprene is a VOC. When the VOC measurements exceed a threshold value (a trigger-level), a 24-hour average canister sample is collected and analyzed for chloroprene. EPA

recently posted the chloroprene sampling results from the Continuous Air Monitoring Program to the Denka Air Monitoring Data Summary Page: <https://www.epa.gov/la/denka-air-monitoring-data-summary>.

In response to your specific question, “What minimum ambient concentration of chloroprene would be required to trigger the SPods?” There is no specific ambient concentration of chloroprene that would trigger the collection of a Summa canister in the SPod. The photoionization detector, a component of the SPod, allows for continuous monitoring of total VOCs, which includes chloroprene. EPA has utilized the VOC and chloroprene data collected during the initial phase of the Continuous Air Monitoring Program, from March 2020 to August 2020, to establish specific trigger-levels for canister collection for each monitoring location based upon the VOCs detected for that monitoring location. EPA will continue to evaluate the trigger method and trigger levels for the duration of the Continuous Air Monitoring Program.

I thank you for your shared interest in addressing the chloroprene levels in the community of LaPlace. We are encouraged by the overall results following additional emissions controls implemented by the company, leading to observed decreases in chloroprene concentrations in the neighborhoods, and we look forward to analyzing the data from the continuous monitoring system.

Sincerely,



Ken McQueen
Regional Administrator

cc (by email):

Dr. Chuck Carr Brown, Secretary, Louisiana Department of Environmental Quality
Louisiana State Senator Gary Smith
Louisiana State Senator Ed Price
Louisiana State Representative Randal Gaines
Louisiana State Representative Gregory Miller
Louisiana Speaker of the House Clay Schexnayder
Lennix Madere, Jr., St. John the Baptist Parish Councilman at Large, Division A
Michael Wright, St. John the Baptist Parish Councilman at Large, Division B
Kurt Becnel, St. John the Baptist Parish Council District 1
Warren “Bosco” Torres Jr., St. John the Baptist Parish Council District 2
Tammy Houston, St. John the Baptist Parish Council District 3
Tyra Duhe-Griffin, St. John the Baptist Parish Council District 4
Robert Arcuri, St. John the Baptist Parish Council District 5
Tonia Schnyder, St. John the Baptist Parish Council District 6
Thomas Malik, St. John the Baptist Parish Council District 7
U.S. Congressman Cedric Richmond
U.S. Congressman Garret Graves